



Patent
Attorney's Docket No. 10992043-1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of) **MAIL STOP APPEAL BRIEF -**
D. Amnon Silverstein) **PATENTS**
Application No.: 09/843,755) Group Art Unit: 2179
Filed: April 30, 2001) Examiner: MYLINH T TRAN
For: METHOD AND APPARATUS FOR) Confirmation No.: 9186
VIRTUAL OVERSIZED DISPLAY)
USING SMALL PANEL DISPLAY AS)
A MOVABLE USER INTERFACE)

REPLY BRIEF

Commissioner for Patents
P.O. Box 1450
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Sir:

This Reply Brief is being filed to respond to points of argument raised in the Examiner's Answer dated April 6, 2007.

CLAIMS 1 AND 10.

In their main Brief, Appellant pointed out that the Examiner has improperly rejected Appellant's independent claims 1 and 10 as being anticipated by a U.S. Patent to Tanaka which clearly does not disclose a detecting means configured to detect "orientation" of a movable display.

On page 9, the Answer appears to be taking the position that the Tanaka et al. patent teaches "the detecting means is configured to detect orientation of the movable display." Appellants respectfully disagree with the Examiner's ultimate conclusion. The Answer still fails to demonstrate that the Tanaka et al. patent anticipate the subject matter of claims 1 and 10.

On page 9 of the Examiner's Answer, lines 5 and 6, the Examiner improperly states: "The position detector detects the position in the horizontal and vertical

"directions" means "detecting orientation" (quote in original). Appellant respectfully submits that the Examiner's attempt to correlate a "position" to an "orientation" is without foundation.

The ability to detect "orientation" encompasses an ability to detect rotation of the display, a feature which is not disclosed by the Tanaka patent. As described at column 3, lines 53-55 of the Tanaka patent, a position detector 1 (Figure 3) is included within the disclosed device and is provided for detecting position in horizontal and vertical directions. However, detection of movement in the horizontal and vertical directions does not constitute detection of the orientation of the display. Column 3, lines 65 to column 4, line 3 of the Tanaka patent describe that a selector 3, based on a position of the display screen 4 (with no mention of any orientation), selects image information. The Tanaka patent clearly does not teach detecting orientation of a movable display. As such, the Examiner's rejection of claims 1 and 10 as being anticipated by the Tanaka patent is clearly improper and without basis.

As previously set forth of record, the ability of Appellant's moveable display to detect orientation of the display provides significant advantages, such as an ability to reorient an image on the movable display to best present information from the database. Such a feature is neither taught nor suggested by the Tanaka patent.

The Examiner has not established an ability to reorient an image on the movable display to best present information from the database, and would not have taught or suggested a detecting means configured to detect orientation of a movable display. Accordingly, the Answer still fails to establish that the Tanaka patent disclose every feature recited in claims 1 and 10. As such, the claims are not anticipated by the teachings of the Tanaka patent.

Independent claim 1 is therefore allowable. Independent claim 10 recites a similar feature and is also allowable.

CLAIM 16

Bridging pages 9 and 10, the Answer appears to be taking the position that while the Tanaka et al. patent fails to teach an image of a keyboard that can be operated using a moveable display, the Cobbley et al. patent allegedly makes up for the deficiency of the Tanaka et al. patent. Appellants respectfully disagree with the Examiner's ultimate conclusion. The Answer still fails to show that the Cobbley et al. patent would have taught or suggested correlating movement of the display 500 to information representing a portion of a first image, where the first image is the image of keyboard interface 508. The Answer still fails to demonstrate that the combination of the Tanaka et al. patent and the Cobbley et al. patent as suggested by the Examiner would have resulted in the subject matter of claim 16.

On page 10 of the Examiner's Answer, lines 2 and 3, the Examiner improperly states: "While Tanaka fails to teach a keyboard image, [the] Cobbley patent shows an image of [a] keyboard of figure 1." Appellant respectfully disagrees with the Examiner's ultimate conclusion.

While Figure 1 of the Cobbley patent discloses a display 500 with a transparent keyboard interface 508, there is no teaching or suggestion in the art for correlating movement of the display 500 to information representing a portion of a first image, where the first image is the image of keyboard interface 508.

As previously set forth of record, there would have been no motivation or suggestion to have combined features of the Tanaka patent with features of the

Cobbley patent in the manner suggested by the Examiner to arrive at Appellant's claim 16 combination.

CONCLUSION

In light of the foregoing, independent claims 1, 10 and 16 are allowable. The remaining points presented in the Examiner's Answer are addressed in Appellant's main Brief, and therefore are not discussed further herein.

For the reasons presented in Appellant's Brief and this Reply Brief, the rejections of the claims are not supported by the cited prior art references.

Respectfully submitted,

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